

[ORAL ARGUMENT NOT YET SCHEDULED]  
Nos. 25-5037, 25-5055

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**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

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CATHY A. HARRIS, IN HER PERSONAL CAPACITY AND IN HER  
OFFICIAL CAPACITY AS MEMBER OF THE MERIT SYSTEMS  
PROTECTION BOARD,

*Appellee,*

v.

SCOTT BESENT, IN HIS OFFICIAL CAPACITY AS SECRETARY OF THE  
TREASURY, ET AL.,

*Appellants.*

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*On Appeal from the United States District Court  
for the District of Columbia*

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**NOTICE OF INTENT TO FILE BRIEF OF  
CONSTITUTIONAL ACCOUNTABILITY CENTER AS *AMICUS CURIAE*  
IN OPPOSITION TO APPELLANTS'  
EMERGENCY MOTION FOR A STAY PENDING APPEAL**

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**CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure, *amicus curiae* states that no party to this brief is a publicly-held corporation, issues stock, or has a parent corporation.

**NOTICE OF INTENT AND REPRESENTATION OF CONSENT TO  
FILE BRIEF OF *AMICUS CURIAE***

Pursuant to D.C. Circuit Rule 29 and the guidance set forth in Section IX.A.4 of the Court's *Handbook of Practice and Internal Procedure*, the Constitutional Accountability Center hereby gives notice that it intends to file a brief as *amicus curiae* in opposition to Appellants' emergency motion for a stay pending appeal in this matter. All parties have consented to the filing of this brief.

Respectfully submitted,

Dated: March 10, 2025

/s/ Brianne J. Gorod

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the D.C. Circuit by using the appellate CM/ECF system on March 10, 2025.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

Executed this 10th of March, 2025.

/s/ Brianne J. Gorod

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